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Ignite International, Ltd., Scott Rohleder,
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DAN BRANDON BILZERIAN, an individual,
 Plaintiff,

v.

IGNITE INTERNATIONAL BRANDS,
 LTD., a Foreign Corporation; IGNITE
 INTERNATIONAL, LTD., a Foreign
 Corporation; PAUL BILZERIAN, an
 individual; SCOTT ROHLEDER, an
 individual; RUPY DHADWAR, an individual,
 Defendants.

CASE NO.: 2:24-cv-02101-RFB-NJK

**ORDER TO EXTEND IGNITE
 INTERNATIONAL BRANDS. LTD.'S
 DEADLINE TO FILE RESPONSE TO
 PLAINTIFF'S COMPLAINT
 (FIRST REQUEST)**

Pursuant to Local Rules, Plaintiff, DAN BRANDON BILZERIAN ("Plaintiff"), and Defendant, IGNITE INTERNATIONAL BRANDS, LTD. ("Ignite Brands" or "Defendant", together with Plaintiff the "Parties"), through their respective counsel, hereby stipulate and agree as follows:

Ignite shall have until April 24, 2025 to file their responsive pleadings to Plaintiff's Complaint.¹

¹ Based on the initial Stipulation [ECF 44] lodged on April 15, 2025, Ignite Brands filed a Motion to Dismiss [ECF 47], on April 16, 2025.

1 As required by LR IA 6-1, Defendant's counsel states that the failure to file the stipulation
2 to extend before the deadline was the result the attorney's excusable neglect, and says: 1) there is
3 no danger of prejudice to the Plaintiff, especially in light of pending motions to dismiss by all other
4 Defendants; 2) there is no impact due to a seven day delay between the deadline and the filing; 3)
5 the reason for the delay was counsel's misapprehension that the only attempted service on the
6 Canadian company had been disputed the service in Texas until Plaintiff's counsel confirmed on
7 April 10, 2025, re-service occurred in Canada on March 18, 2025 (making the responsive pleading
8 due April 8th) and agreed to an extension until April 24, 2025 (although Plaintiff's counsel would
9 not return to his office on April 14, 2025), and both counsel agreed to the stipulation to extend on
10 April 14th, which Defendant's counsel lodged with the Court on April 15, 2025; 4) Defendant acted
11 in good faith and without any intent to delay.²

12 Plaintiff takes no position on excusable neglect and expressly reserves all rights, remedies,
13 defenses, objections, and legal arguments. Plaintiff also contends that service in Texas was valid;
14 however, out of abundance of caution, he decided to re-serve the Defendant in Canada.

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28 ² See, *Briones v. Riviera Hotel & Casino*, 116 F.3d 379, 381 (9th Cir. 1997).

This is the Parties' first request for extension of time this deadline, and it is not intended to cause any delay or prejudice to any party.

IT IS SO STIPULATED.

Dated this 18th day of April 2025.

Dated this 18th day of April 2025.

GARMAN TURNER GORDON LLP

THE MEDRALA LAW FIRM, PROF. LLC

/s/ Eric R. Olsen

/s/ Jakub P. Medrala

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Attorneys for Defendants

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and Ignite International Brands, Ltd.

ORDER

IT IS SO ORDERED:


Nancy J. Koppe
United States Magistrate Judge

DATED: April 21, 2025